

<i>SERFF Tracking Number:</i>	<i>GRAX-G127181560</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Great American Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>48853</i>
<i>Company Tracking Number:</i>	<i>P1029711NW ET AL</i>		
<i>TOI:</i>	<i>A07I Individual Annuities - Special</i>	<i>Sub-TOI:</i>	<i>A07I.001 Equity Indexed</i>
<i>Product Name:</i>	<i>Annuity Individual Fixed</i>		
<i>Project Name/Number:</i>	<i>Annuity Individual Fixed/P1029711NW et al</i>		

Filing at a Glance

Company: Great American Life Insurance Company

Product Name: Annuity Individual Fixed SERFF Tr Num: GRAX-G127181560 State: Arkansas

TOI: A07I Individual Annuities - Special SERFF Status: Closed-Approved-Closed State Tr Num: 48853

Sub-TOI: A07I.001 Equity Indexed Co Tr Num: P1029711NW ET AL State Status: Approved-Closed

Filing Type: Form Reviewer(s): Linda Bird

Author: SPI Disposition Date: 05/27/2011

GreatAmericanFinancialRes

Date Submitted: 05/23/2011 Disposition Status: Approved-Closed

Implementation Date Requested: Implementation Date:

State Filing Description:

General Information

Project Name: Annuity Individual Fixed

Project Number: P1029711NW et al

Requested Filing Mode: Review & Approval

Explanation for Combination/Other:

Submission Type: New Submission

Filing Status Changed: 05/27/2011

State Status Changed: 05/27/2011

Created By: SPI GreatAmericanFinancialRes

Corresponding Filing Tracking Number:

Filing Description:

Status of Filing in Domicile: Authorized

Date Approved in Domicile: 03/14/2011

Domicile Status Comments:

Market Type:

Overall Rate Impact:

Deemer Date:

Submitted By: SPI GreatAmericanFinancialRes

Enclosed for your review and approval are revised supplemental specification pages for contract form numbers P1029704NW and P1029804NW, which were approved for use in your state on 02/08/05, under filing number 28608. These insert pages have not been previously submitted to your Department for preliminary review. This submission does not contain any provisions, conditions, or concepts that are uncommon, unusual or possibly controversial from the standpoint of normal company or industry standards.

The following changes have been made to the specification pages of the annuity contracts referenced above:

SERFF Tracking Number: GRAX-G127181560 State: Arkansas
Filing Company: Great American Life Insurance Company State Tracking Number: 48853
Company Tracking Number: P1029711NW ET AL
TOI: A071 Individual Annuities - Special Sub-TOI: A071.001 Equity Indexed
Product Name: Annuity Individual Fixed
Project Name/Number: Annuity Individual Fixed/P1029711NW et al

1. Added "****" to all instances of "S&P 500®" on page ia.
2. Added page ib with the disclosure required by Standard & Poor.
3. Changed the form number on both pages to P1029711NW and P1029811NW, respectively.

Please accept this letter as certification that no other changes have been made to the form.

Company and Contact

Filing Contact Information

Juli Fleming, Compliance Filing Specialist jffleming@gafri.com
P. O. Box 5420 513-412-0018 [Phone] 10018 [Ext]
Cincinnati, OH 45201-5420 513-361-5967 [FAX]

Filing Company Information

Great American Life Insurance Company CoCode: 63312 State of Domicile: Ohio
P. O. Box 5420 Group Code: 84 Company Type:
Cincinnati, OH 45201-5420 Group Name: Great American State ID Number:
Financial Resources, Inc.
(800) 854-3649 ext. [Phone] FEIN Number: 13-1935920

Filing Fees

Fee Required? Yes
Fee Amount: \$100.00
Retaliatory? Yes
Fee Explanation:
Per Company: No

COMPANY	AMOUNT	DATE PROCESSED	TRANSACTION #
Great American Life Insurance Company	\$100.00	05/23/2011	47906420

<i>SERFF Tracking Number:</i>	<i>GRAX-G127181560</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Great American Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>48853</i>
<i>Company Tracking Number:</i>	<i>P1029711NW ET AL</i>		
<i>TOI:</i>	<i>A071 Individual Annuities - Special</i>	<i>Sub-TOI:</i>	<i>A071.001 Equity Indexed</i>
<i>Product Name:</i>	<i>Annuity Individual Fixed</i>		
<i>Project Name/Number:</i>	<i>Annuity Individual Fixed/P1029711NW et al</i>		

Correspondence Summary

Dispositions

Status	Created By	Created On	Date Submitted
Approved-Closed	Linda Bird	05/27/2011	05/27/2011

<i>SERFF Tracking Number:</i>	<i>GRAX-G127181560</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Great American Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>48853</i>
<i>Company Tracking Number:</i>	<i>P1029711NW ET AL</i>		
<i>TOI:</i>	<i>A071 Individual Annuities - Special</i>	<i>Sub-TOI:</i>	<i>A071.001 Equity Indexed</i>
<i>Product Name:</i>	<i>Annuity Individual Fixed</i>		
<i>Project Name/Number:</i>	<i>Annuity Individual Fixed/P1029711NW et al</i>		

Disposition

Disposition Date: 05/27/2011

Implementation Date:

Status: Approved-Closed

Comment:

Rate data does NOT apply to filing.

<i>SERFF Tracking Number:</i>	<i>GRAX-G127181560</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Great American Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>48853</i>
<i>Company Tracking Number:</i>	<i>P1029711NW ET AL</i>		
<i>TOI:</i>	<i>A071 Individual Annuities - Special</i>	<i>Sub-TOI:</i>	<i>A071.001 Equity Indexed</i>
<i>Product Name:</i>	<i>Annuity Individual Fixed</i>		
<i>Project Name/Number:</i>	<i>Annuity Individual Fixed/P1029711NW et al</i>		

Schedule	Schedule Item	Schedule Item Status	Public Access
Supporting Document	Flesch Certification		No
Supporting Document	Application		No
Supporting Document	Life & Annuity - Acturial Memo		No
Supporting Document	AR - NAIC TRANSMITTAL DOCUMENT, AR - NAIC FORM FILING ATTACHMENT		Yes
Supporting Document	Cover Letter		Yes
Form	Individual Deferred Annuity Contract - Insert Page		Yes
Form	Individual Deferred Annuity Contract - Insert Page		Yes

SERFF Tracking Number: GRAX-G127181560 State: Arkansas

Filing Company: Great American Life Insurance Company State Tracking Number: 48853

Company Tracking Number: P1029711NW ET AL

TOI: A071 Individual Annuities - Special Sub-TOI: A071.001 Equity Indexed

Product Name: Annuity Individual Fixed

Project Name/Number: Annuity Individual Fixed/P1029711NW et al

Form Schedule

Lead Form Number: P1029711NW

Schedule Item Status	Form Number	Form Type	Form Name	Action	Action Specific Data	Readability	Attachment
	P1029711NW	Policy/Cont	Individual Deferred ract/Fratern Annuity Contract - al Insert Page Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		0.000	P1029711NW Supp Spec.PDF
	P1029811NW	Policy/Cont	Individual Deferred ract/Fratern Annuity Contract - al Insert Page Certificate: Amendmen t, Insert Page, Endorseme nt or Rider	Initial		0.000	P1029811NW .PDF

SUPPLEMENTAL CONTRACT SPECIFICATIONS

CONTRACT NUMBER: [0000000000]

INTEREST STRATEGY(IES):

Strategy Effective Date: [SEPTEMBER 1, 2007]

DECLARED RATE STRATEGY(IES)		
Amount Applied*	[\$]	
Term	[1 Year]	
	Current**	
Declared Interest Rate	[3.0%]	
[Amount Applied*]	[\$]	
[Term]	[2 Years]	
	[Current**]	
[Declared Interest Rate]	[2.50%]	

INDEXED STRATEGY(IES)		
Amount Applied*	[\$]	
Index	[S&P 500 [®] ***]	
Beginning Index Value**	[1000.00]	
Index Method	[Point-to-Point]	
Term	[1 year]	
	Current**	Guaranteed
Base Interest Rate	[0%]	No less than [0%]
Participation Rate	[100%]	No less than [60%]
Index Factor	[0%]	No greater than [2%]
Cap	[10%]	No less than [4%]
[Amount Applied*]	[\$]	
[Index]	[S&P 500 [®] ***]	
[Beginning Index Value**]	[1000.00]	
[Index Method]	[Point-to-Point]	
[Term]	[1 Year]	
	[Current**]	[Guaranteed]
[Base Interest Rate]	[1%]	[No less than 0%]
[Participation Rate]	[100%]	[No less than 80%]
[Index Factor]	[0%]	[No greater than 1%]
[Cap]	[8%]	[No less than 5%]

The Index used for Indexed Strategies available under this Contract is the Standard & Poor's 500 Index. It excludes any dividends that may be paid by the firms that comprise the Index.

* Amount Applied is based on the Account Value as of the Strategy Effective Date, stated above.

** Rates, Factors, Caps and Values are shown as of the Strategy Effective Date, stated above.

["The [American Legend] is not sponsored, endorsed, sold or promoted by Standard & Poor's ("S&P") or its third party licensors. Neither S&P nor its third party licensors makes any representation or warranty, express or implied, to the owners of the [American Legend] or any member of the public regarding the advisability of investing in securities generally or in the [American Legend] particularly or the ability of the S&P 500® index (the "Index") to track general stock market performance. S&P's and its third party licensor's only relationship to [Great American Life Insurance Company] is the licensing of certain trademarks and trade names of S&P and the third party licensors and of the Index, which is determined, composed and calculated by S&P or its third party licensors without regard to Great American Life Insurance Company or [American Legend], S&P and its third party licensors have no obligation to take the needs of Great American Life Insurance Company or the owners of the [American Legend] into consideration in determining, composing or calculating the Index. Neither S&P nor its third party licensors is responsible for and has not participated in the determination of the prices and amount of the [American Legend] or the timing of the issuance or sale of the [American Legend] or in the determination or calculation of the equation by which the [American Legend] is to be converted into cash. S&P has no obligation or liability in connection with the administration, marketing or trading of the [American Legend].

NEITHER S&P, ITS AFFILIATES NOR THEIR THIRD PARTY LICENSORS GUARANTEE THE ADEQUACY, ACCURACY, TIMELINESS OR COMPLETENESS OF THE INDEX OR ANY DATA INCLUDED THEREIN OR ANY COMMUNICATIONS, INCLUDING BUT NOT LIMITED TO, ORAL OR WRITTEN COMMUNICATIONS (INCLUDING ELECTRONIC COMMUNICATIONS) WITH RESPECT THERETO. S&P, ITS AFFILIATES AND THEIR THIRD PARTY LICENSORS SHALL NOT BE SUBJECT TO ANY DAMAGES OR LIABILITY FOR ANY ERRORS, OMISSIONS OR DELAYS THEREIN. S&P MAKES NO EXPRESS OR IMPLIED WARRANTIES, AND EXPRESSLY DISCLAIMS ALL WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE WITH RESPECT TO THE MARKS, THE INDEX OR ANY DATA INCLUDED THEREIN. WITHOUT LIMITING ANY OF THE FOREGOING, IN NO EVENT WHATSOEVER SHALL S&P, ITS AFFILIATES OR THEIR THIRD PARTY LICENSORS BE LIABLE FOR ANY INDIRECT, SPECIAL, INCIDENTAL, PUNITIVE OR CONSEQUENTIAL DAMAGES, INCLUDING BUT NOT LIMITED TO, LOSS OF PROFITS, TRADING LOSSES, LOST TIME OR GOODWILL, EVEN IF THEY HAVE BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES, WHETHER IN CONTRACT, TORT, STRICT LIABILITY OR OTHERWISE.

"Standard & Poor's®", "S&P®", "S&P 500®" and "Standard & Poor's 500™" are trademarks of Standard & Poor's Financial Services LLC ("Standard & Poor's") and have been licensed for use by Great American Life Insurance Company."]

SUPPLEMENTAL CONTRACT SPECIFICATIONS

CONTRACT NUMBER: [0000000000]

INTEREST STRATEGY(IES):

Strategy Effective Date: [SEPTEMBER 1, 2007]

DECLARED RATE STRATEGY(IES)		
Amount Applied*	[\$]	
Term	[1 Year]	
	Current**	
Declared Interest Rate	[3.0%]	
[Amount Applied*]	[\$]	
[Term]	[2 Years]	
	[Current**]	
[Declared Interest Rate]	[2.50%]	

INDEXED STRATEGY(IES)		
Amount Applied*	[\$]	
Index	[S&P 500®***]	
Beginning Index Value**	[1000.00]	
Index Method	[Point-to-Point]	
Term	[1 year]	
	Current**	Guaranteed
Base Interest Rate	[0%]	No less than [0%]
Participation Rate	[100%]	No less than [60%]
Index Factor	[0%]	No greater than [2%]
Cap	[10%]	No less than [4%]
[Amount Applied*]	[\$]	
[Index]	[S&P 500®***]	
[Beginning Index Value**]	[1000.00]	
[Index Method]	[Point-to-Point]	
[Term]	[1 Year]	
	[Current**]	[Guaranteed]
[Base Interest Rate]	[1%]	[No less than 0%]
[Participation Rate]	[100%]	[No less than 80%]
[Index Factor]	[0%]	[No greater than 1%]
[Cap]	[8%]	[No less than 5%]

* Amount Applied is based on the Account Value as of the Strategy Effective Date, stated above.

** Rates, Factors, Caps and Values are shown as of the Strategy Effective Date, stated above.

["The [American Legend] is not sponsored, endorsed, sold or promoted by Standard & Poor's ("S&P") or its third party licensors. Neither S&P nor its third party licensors makes any representation or warranty, express or implied, to the owners of the [American Legend] or any member of the public regarding the advisability of investing in securities generally or in the [American Legend] particularly or the ability of the S&P 500® index (the "Index") to track general stock market performance. S&P's and its third party licensor's only relationship to [Great American Life Insurance Company] is the licensing of certain trademarks and trade names of S&P and the third party licensors and of the Index, which is determined, composed and calculated by S&P or its third party licensors without regard to Great American Life Insurance Company or [American Legend], S&P and its third party licensors have no obligation to take the needs of Great American Life Insurance Company or the owners of the [American Legend] into consideration in determining, composing or calculating the Index. Neither S&P nor its third party licensors is responsible for and has not participated in the determination of the prices and amount of the [American Legend] or the timing of the issuance or sale of the [American Legend] or in the determination or calculation of the equation by which the [American Legend] is to be converted into cash. S&P has no obligation or liability in connection with the administration, marketing or trading of the [American Legend].

NEITHER S&P, ITS AFFILIATES NOR THEIR THIRD PARTY LICENSORS GUARANTEE THE ADEQUACY, ACCURACY, TIMELINESS OR COMPLETENESS OF THE INDEX OR ANY DATA INCLUDED THEREIN OR ANY COMMUNICATIONS, INCLUDING BUT NOT LIMITED TO, ORAL OR WRITTEN COMMUNICATIONS (INCLUDING ELECTRONIC COMMUNICATIONS) WITH RESPECT THERETO. S&P, ITS AFFILIATES AND THEIR THIRD PARTY LICENSORS SHALL NOT BE SUBJECT TO ANY DAMAGES OR LIABILITY FOR ANY ERRORS, OMISSIONS OR DELAYS THEREIN. S&P MAKES NO EXPRESS OR IMPLIED WARRANTIES, AND EXPRESSLY DISCLAIMS ALL WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE OR USE WITH RESPECT TO THE MARKS, THE INDEX OR ANY DATA INCLUDED THEREIN. WITHOUT LIMITING ANY OF THE FOREGOING, IN NO EVENT WHATSOEVER SHALL S&P, ITS AFFILIATES OR THEIR THIRD PARTY LICENSORS BE LIABLE FOR ANY INDIRECT, SPECIAL, INCIDENTAL, PUNITIVE OR CONSEQUENTIAL DAMAGES, INCLUDING BUT NOT LIMITED TO, LOSS OF PROFITS, TRADING LOSSES, LOST TIME OR GOODWILL, EVEN IF THEY HAVE BEEN ADVISED OF THE POSSIBILITY OF SUCH DAMAGES, WHETHER IN CONTRACT, TORT, STRICT LIABILITY OR OTHERWISE.

"Standard & Poor's®", "S&P®", "S&P 500®" and "Standard & Poor's 500™" are trademarks of Standard & Poor's Financial Services LLC ("Standard & Poor's") and have been licensed for use by Great American Life Insurance Company."]

<i>SERFF Tracking Number:</i>	<i>GRAX-G127181560</i>	<i>State:</i>	<i>Arkansas</i>
<i>Filing Company:</i>	<i>Great American Life Insurance Company</i>	<i>State Tracking Number:</i>	<i>48853</i>
<i>Company Tracking Number:</i>	<i>P1029711NW ET AL</i>		
<i>TOI:</i>	<i>A071 Individual Annuities - Special</i>	<i>Sub-TOI:</i>	<i>A071.001 Equity Indexed</i>
<i>Product Name:</i>	<i>Annuity Individual Fixed</i>		
<i>Project Name/Number:</i>	<i>Annuity Individual Fixed/P1029711NW et al</i>		

Supporting Document Schedules


	Item Status:	Status
		Date:
Satisfied - Item:	AR - NAIC TRANSMITTAL DOCUMENT, AR - NAIC FORM FILING ATTACHMENT	
Comments:		
Attachments:		
	AR - NAIC TRANSMITTAL DOCUMENT.PDF	
	AR - NAIC FORM FILING ATTACHMENT.PDF	

	Item Status:	Status
		Date:
Satisfied - Item:	Cover Letter	
Comments:		
Attachment:		
	Cover Letter.PDF	

Life, Accident & Health, Annuity, Credit Transmittal Document

1.	Prepared for the State of	Arkansas					
2.	Department Use Only						
	State Tracking ID						
3.	Insurer Name & Address	Domicile	Insurer License Type	NAIC Group #	NAIC #	FEIN #	State #
	Great American Life Insurance Company P. O. Box 5420 Cincinnati OH 45201-5420	OH		0084	63312	13-1935920	
4.	Contact Name & Address	Telephone #	Fax #	E-mail Address			
	Juli K. Fleming P. O. Box 5420 Cincinnati OH 45201-5420	800-854-3649 Ext. 10018	513-361-5967	jffleming@gafri.com			
5.	Requested Filing Mode	<input checked="" type="checkbox"/> Review & Approval <input type="checkbox"/> File & Use <input type="checkbox"/> Informational <input type="checkbox"/> Combination (please explain): _____ <input type="checkbox"/> Other (please explain): _____					
6.	Company Tracking Number	P1029711NW et al					
7.	<input checked="" type="checkbox"/> New Submission <input type="checkbox"/> Resubmission	Previous file # _____					
8.	Market	<input checked="" type="checkbox"/> Individual <input type="checkbox"/> Franchise <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Small <input type="checkbox"/> Large <input type="checkbox"/> Small and Large <input type="checkbox"/> Employer <input type="checkbox"/> Association <input type="checkbox"/> Blanket <input type="checkbox"/> Discretionary <input type="checkbox"/> Trust <input type="checkbox"/> Other: _____ </div> <div>Group</div> </div>					
9.	Type of Insurance	A07I Individual Annuities - Special					
10.	Product Coding Matrix Filing Code	A07I.001 Equity Indexed					
11.	Submitted Documents	<input checked="" type="checkbox"/> <u>FORMS</u> <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Policy <input type="checkbox"/> Application/Enrollment <input type="checkbox"/> Schedule of Benefits </div> <div> <input type="checkbox"/> Outline of Coverage <input type="checkbox"/> Rider/Endorsement <input checked="" type="checkbox"/> Other: <u>Insert Page</u> </div> <div> <input type="checkbox"/> Certificate <input type="checkbox"/> Advertising </div> </div> <input type="checkbox"/> <u>RATES</u> <input type="checkbox"/> New Rate <input type="checkbox"/> Revised Rate <input type="checkbox"/> <u>FILING OTHER THAN FORM OR RATE:</u> Please explain: _____ <u>SUPPORTING DOCUMENTATION</u> <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Articles of Incorporation <input type="checkbox"/> Association Bylaws <input type="checkbox"/> Statement of Variability <input type="checkbox"/> Actuarial Memorandum <input type="checkbox"/> Other: _____ </div> <div> <input type="checkbox"/> Third Party Authorization <input type="checkbox"/> Trust Agreement <input type="checkbox"/> Certifications </div> </div>					

12.	Filing Submission Date	05/23/11
13.	Filing Fee (If required)	Amount _____ Check Date _____ Retaliatory <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No Check Number _____
14.	Date of Domiciliary Approval	03/14/11
15.	Filing Description:	
	<p>Enclosed for your review and approval are revised supplemental specification pages for contract form numbers P1029704NW and P1029804NW, which were approved for use in your state on 02/08/05, under filing number 28608. These insert pages have not been previously submitted to your Department for preliminary review. This submission does not contain any provisions, conditions, or concepts that are uncommon, unusual or possibly controversial from the standpoint of normal company or industry standards.</p> <p>The following changes have been made to the specification pages of the annuity contracts referenced above:</p> <ol style="list-style-type: none"> 1. Added "****" to all instances of "S&P 500®" on page ia. 2. Added page ib with the disclosure required by Standard & Poor. 3. Changed the form number on both pages to P1029711NW and P1029811NW, respectively. <p>Please accept this letter as certification that no other changes have been made to the form.</p>	

16.	Certification (If required)	
<p>I HEREBY CERTIFY that I have reviewed the applicable filing requirements for this filing, and the filing complies with all applicable statutory and regulatory provisions for the state of <u>Arkansas</u>.</p> <p>Print Name <u>Juli K. Fleming</u> Title <u>Compliance Filing Specialist</u></p> <p>Signature <u></u> Date <u>05/23/11</u></p>		

17.	Form Filing Attachment	
This filing transmittal is part of company tracking number		P1029711NW et al
This filing corresponds to rate filing company tracking number		

	Document Name	Form Number		Replaced Form Number
	Description			Previous State Filing Number
01	Individual Deferred Annuity Contract - Insert Page	P1029711NW	<input checked="" type="checkbox"/> Initial <input type="checkbox"/> Revised <input type="checkbox"/> Other _____	
02	Individual Deferred Annuity Contract - Insert Page	P1029811NW	<input checked="" type="checkbox"/> Initial <input type="checkbox"/> Revised <input type="checkbox"/> Other _____	
03			<input type="checkbox"/> Initial <input type="checkbox"/> Revised <input type="checkbox"/> Other _____	
04			<input type="checkbox"/> Initial <input type="checkbox"/> Revised <input type="checkbox"/> Other _____	
05			<input type="checkbox"/> Initial <input type="checkbox"/> Revised <input type="checkbox"/> Other _____	
06			<input type="checkbox"/> Initial <input type="checkbox"/> Revised <input type="checkbox"/> Other _____	
07			<input type="checkbox"/> Initial <input type="checkbox"/> Revised <input type="checkbox"/> Other _____	
08			<input type="checkbox"/> Initial <input type="checkbox"/> Revised <input type="checkbox"/> Other _____	
09			<input type="checkbox"/> Initial <input type="checkbox"/> Revised <input type="checkbox"/> Other _____	
10			<input type="checkbox"/> Initial <input type="checkbox"/> Revised <input type="checkbox"/> Other _____	
11			<input type="checkbox"/> Initial <input type="checkbox"/> Revised <input type="checkbox"/> Other _____	



LIFE INSURANCE COMPANY

Administrative Mailing Address: P.O. Box 5420, Cincinnati, Ohio 45201-5420

May 23, 2011

NAIC No. 0084-63312
FEIN No. 13-1935920

Insurance Commissioner Jay Bradford
Compliance - Life and Health
Arkansas Department of Insurance
1200 West Third Street
Little Rock, AR 72201-1904

RE: Request For Approval - Great American Life Insurance Company
P1029711NW Individual Deferred Annuity Contract - Insert Page
P1029811NW Individual Deferred Annuity Contract - Insert Page

Dear Insurance Commissioner Bradford:

Enclosed for your review and approval are revised supplemental specification pages for contract form numbers P1029704NW and P1029804NW, which were approved for use in your state on 02/08/05, under filing number 28608. These insert pages have not been previously submitted to your Department for preliminary review. This submission does not contain any provisions, conditions, or concepts that are uncommon, unusual or possibly controversial from the standpoint of normal company or industry standards.

The following changes have been made to the specification pages of the annuity contracts referenced above:

1. Added "***" to all instances of "S&P 500@" on page ia.
2. Added page ib with the disclosure required by Standard & Poor.
3. Changed the form number on both pages to P1029711NW and P1029811NW, respectively.

Please accept this letter as certification that no other changes have been made to the form.

With this information, I look forward to receiving a favorable response to this filing.

If you have any questions or require additional information regarding this submission, please feel free to contact me at either of the phone numbers indicated below or via e-mail at jfleming@gafri.com.

Sincerely,

Juli K. Fleming
Compliance Filing Specialist

JULI K. FLEMING , COMPLIANCE FILING SPECIALIST
(800) 854-3649 (TOLL FREE - EXT. 10018)
(513) 412-0018 (DIRECT DIAL) * (513) 361-5967 FAX